

1. This is the General Health and Safety Policy for Blue Elephant (UK) Ltd

Blue Elephant (UK) Ltd (BE) is a production and design firm focusing on the management, design and supply of equipment specifically for live interactive and event environments. BE operate from a warehouse and office facility at Elephant House, Lagham Rd, Godstone RH9 8HB. BE own a small number of vehicles for equipment transport but regularly expect to subcontract logistics along with supplementing equipment and labour shortages or where specific skills are required.

BE is owned and operated by 3 directors who share duties across a range of departments including finance, operations, design and production. Christopher Burnage and William Kemp are the joint majority shareholder and all key decision-making lies with them. Management of health, safety and general welfare is regarded as a priority and this ethos of "top down management" is shared with the employees. Resources are allocated to H&S not only to comply with statutory obligations but also to help create an effective operational structure with accountability for actions at all levels. We aim for our staff and subcontractors to know that they work in a safe and friendly environment with an accessible reporting system to aid in our management processes. Further to this, staff working in a safe and effective way will reduce the stresses placed upon physical equipment, vehicles and storage.

Whilst all operations of BE aim to comply with the Health and Safety at Work etc. Act 1974, we appreciate that working within the environment of live events and installations can carry regular specific risks such as those associated with electricity, manual handling and work at height. BE aim to operate as an industry leader and manage risks through effective planning, training and supervision.

In short, BE shall:

- *Provide a safe place of work and safe methods of carrying out the work*
- *Assume the responsibility to operate in a legal and responsible way, in line with relevant legislation and best practice*
- *Ensure that employees are competent and have the required knowledge and experience to carry out the work*
- *Ensure that adequate training and supervision for all staff is provided*
- *Ensure that plant, equipment and tools are of the correct standard and type and are in good working order with adequate inspection processes*

This document has been created with the assistance of GMG Network Ltd (GMG) and should be reviewed annually or immediately if circumstances dictate.

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GMG Network Ltd are accredited by CHAS and are a member of the PSA



This policy has been compiled based upon information supplied to GMG by BE. GMG are not liable for errors or omissions resulting from false, inaccurate or incomplete information.

Signed:



John Gibson, BSc (Hons), Tech IOSH

06/09/2022

Review date:

05/09/2023

Signed: Blue Elephant (UK) Ltd Directors	<i>Christopher Burnage</i>	Date:	06/09/2022
	<i>William Kemp</i>	Date:	06/09/2022

2. This is the Statement of Organisational Policy for Blue Elephant (UK) Ltd

<i>Christopher Burnage</i>		has overall and final responsibility for health and safety
<i>Christopher Burnage</i>		has day-to-day responsibility for ensuring this policy is put into practice at BE premises
<i>Jason Hartnoll</i>		has day-to-day responsibility for ensuring this policy is put into practice at BE project sites
Statement of general policy	Responsibility of: Name/Title	Action/Arrangements (What are you going to do?)
Prevent accidents and cases of work-related ill health by managing the health and safety risks in the workplace	<i>Christopher Burnage</i>	Relevant risk assessments completed and actions arising out of those assessments implemented.
Provide clear instructions and information, and adequate training, to ensure employees are competent to do their work	<i>Christopher Burnage</i>	Staff and subcontractors given necessary health and safety induction and provided with appropriate training. Subcontractors vetted prior to appointment to ensure they comply with BE Ltd minimum standards.
Implement emergency procedures – evacuation in case of fire or other significant incident.	<i>Christopher Burnage</i>	Within the BE Ltd office and warehouse spaces, exit routes are in place, signed and well known. When at a work site, any arrangements that are in place are to be investigated upon arrival and adhered to for the full duration on site.
Maintain safe and healthy working conditions, provide and maintain plant, equipment and machinery, and ensure safe storage/use of substances	<i>Christopher Burnage</i>	Toilets, washing facilities and drinking water provided. Work environments to have adequate lighting and cable routing to minimize trip hazards. Working hours (including travel arrangements) are to be monitored and kept reasonable for the worker.

Health and safety law poster is displayed at	In Kitchen
Warehouse first-aid box is located	On wall in warehouse
Accident book is located	https://sw.citrushr.com/IncidentBook.aspx
Online incident report	https://sw.citrushr.com/CreateEditIncident.aspx

Accidents and ill health at work reported under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) <http://www.hse.gov.uk/riddor>

3. This is the Statement of General Health and Safety Arrangements for Blue Elephant (UK) Ltd

It includes practical safety policies to be implemented by staff and also key risk assessments for identified regular operations. Processes and documentation should follow adequate risk assessments as required by the Reg (3) of the Management of Health and Safety at Work Regulations 1999. The overall management plan is aimed to follow the “Plan, Do, Check, Act” process outlined within HSE guidance HSG65 (<http://www.hse.gov.uk/pubns/priced/hsg65.pdf>) to achieve balance between systems and behavior whilst delivering effective arrangements.

3.1) Risk Assessment

Risk assessment of tasks is a cornerstone of BE H&S management. It is proven to be an effective method of analyzing hazards in order to implement effective control methods, noting that only significant findings must be documented – **a risk assessment is not about creating huge amounts of paperwork, but rather about identifying sensible measures to control the risks in the workplace.** At all times, staff are required to take an active approach to safety by “dynamically” risk assessing their tasks – where hazards are identified it may be necessary to pause work to consider and implement better or safer methods as analysed by risk assessment. For complex or hazardous tasks this risk assessment should be documented by a competent person – hazards and control methods should be effectively communicated to relevant workers in good time. Training in basic risk assessment should be provided to BE staff in order that they can perform their tasks without minimal risk of harm to themselves or others.

One of the key elements of a risk assessment is accurately identifying hazards. BE seek to appoint competent staff and subcontractors to perform work with relevant experience to identify hazards and implement control measures. Where knowledge and experience levels are low, BE aim to improve awareness through supervision and training. For reference, BE staff may refer to HSE guidance INDG163 (<http://www.hse.gov.uk/pubns/indg163.pdf>)

When compiling risk assessments, BE staff should use a matrix system which relates the severity of a hazard to the likelihood of its occurrence as outlined below

Probability (P)	Severity (S)	Risk Calculation (R)
5 – Almost inevitable	5 – Multiple death or very serious injury	1 – 4 Low (<i>No further action required</i>) 5 – 8 Medium (<i>Justify and review on each occurrence</i>) 9 – 25 High (<i>Immediate action required to make task less hazardous</i>)
4 – Very likely	4 – Single death or very serious injury	
3 – Likely	3 – RIDDOR Injury	
2 – Unlikely	2 – Absence from work for 3 days	
1 – Very unlikely	1 – Minor / First aid	

5	5	10	15	20	25
4	4	8	12	16	20
3	3	6	9	12	15
2	2	4	6	8	10
1	1	2	3	4	5
	1	2	3	4	5

3.2) Welfare

BE and its employees are required to take reasonable steps to ensure that a place of work is kept free from foreseeable hazards. In particular, access and egress routes must be kept clear of obstructions. This includes ensuring fire exits and access routes are kept clear, cables do not trail across pedestrian routes and that obstacles are quickly removed. In addition, safety provisions such as fire doors should not be propped open or fire extinguishers obstructed without a suitable active risk management plan in place.

Lighting in a working area is to be suitable and sufficient to allow staff to work and move around safely. Within the event industry it is known that working hours can be both long and strenuous, staffing requirements are to be organized in such a way that this is minimized where possible and that suitable refreshment breaks are possible. For events which also require a substantial element of travel (such as a flight or long drive) then this is also to be considered within the working schedule.

Where required, reference may be made to HSE ACoP L24 (<http://www.hse.gov.uk/pubns/priced/l24.pdf>)

3.3) Fire Precautions

As required by the Regulatory Reform (Fire Safety) Order 2005, BE will undertake a suitable fire risk assessment of their premises and act upon the findings. Emergency exit routes are to be signposted and kept clear. Staff are not to tamper with or misuse any emergency or firefighting equipment and should familiarize themselves with exit routes upon arrival at their place of work. A fire risk assessment and escape plan are available as a separate document.

3.4) Safe Handling and Use of Substances

BE seek to control the use of substances hazardous to health (COSHH) using industry standard practices to comply with COSHH Regulations 2002. Hazardous substances are to be identified and labelled upon arrival to BE work areas and workers aware of accompanying hazards – reference to the substance Manufacturer Safety Data Sheet (MSDS) may be required and a copy should be on file for all substances in use. Use of substance is to be risk assessed and reviewed to ensure that they are suitable for the task (eg. Cleaning materials or paint). Note also that workers should be made aware of invisible substances such as wood dust or gasses. Suitable PPE such as gloves, goggles or dust masks are to be provided where necessary. Where staff are unsure, refer to management who may use HSE guidance INDG136 for reference (<http://www.hse.gov.uk/pubns/indg136.pdf>)

3.5) Personal Protective Equipment (PPE)

Where the need for PPE is identified by risk assessment, it should be suitable for the activity and maintained to a functional standard. In particular this may relate to the use of robust footwear and gloves for manual handling, weather appropriate clothing (eg. Waterproof or thermal), high visibility clothing when in an area of vehicle movement, hard hats and harnesses when working at height. BE staff will be trained where necessary in the use and inspection of supplied PPE. Subcontracted staff must provide their own PPE and be competent in its use and inspection.

3.6) First Aid

BE will supply a comprehensive first aid kit within their warehouse unit and, where appropriate, also supply a first aid kit to remote locations. We understand that a first aid kit by itself offers little value so will supply adequate training to key personnel in each work location. These trained personnel are responsible for managing the contents of BE first aid kits and reporting shortfalls.

3.7) Display Screen Equipment (DSE)

It is the policy of BE to ensure that anyone using a display screen as a significant part of their everyday work is entitled to have appropriate eye and eyesight tests from an optician or doctor and glasses if they are needed for work, if requested by the employee. Further to this, we aim to operate a program of workstation DSE assessment to remind and aid workers of preferred working habits.

3.8) Electrical Equipment

It is the policy of BE to ensure that any electrical system at work is safe to use and properly maintained, complying with relevant regulations and standards such as BS7671 and BS7909. All electrical business equipment is to be visually checked by a competent person for signs of damage at each use.

Electrical equipment and cables owned by BE is formally tested (Combined inspection & test) for electrical safety as determined by standard policy – or where this isn't documented at least annually as outlined in HSE guidance HSG107 (<http://www.hse.gov.uk/pubns/priced/hsg107.pdf>)

Electrical equipment subcontracted by BE should be PAT tested (Combined inspection and test) with a testing sticker visible and in-date.

On site work will be installed with regard to the temporary installation standard BS7909. Of particular note is that all final circuits must have additional protection, usually in the form of a 30mA RCD.

3.9) Work and Lifting Equipment

BE will manage, maintain and inspect equipment as required by the Provision and Use of Work Equipment Regulations 1999 (PUWER). As BE also operate and provide rigging equipment, thorough examinations and recordings of rigging equipment and lifting equipment will occur in accordance with the Lifting Operations and Lifting Equipment Regulations 1999 (LOLER). Staff and management will be provided with adequate training to operate and supervise the use of equipment as necessary.

3.10) Smoking

The Company operates a 'No Smoking' policy at all times throughout the premises including common areas i.e. canteen, corridors, warehouse etc. This policy also operates outside normal work hours. Cigarette stubs should be extinguished properly and put in the bin provided.

3.11) Driving at Work

It is the policy of BE to ensure that staff who are required to drive as part of their work activities are competent to drive and hold a license for the relevant vehicle. Vehicles should be fit for purpose and adequately maintained. Where employee vehicles are to be used, copies of MOT testing and suitable insurance are to be held on file.

3.12) Lone Workers

BE advises staff who work by themselves without close or direct supervision or those who visit other premises, to take a mobile phone with them where practical. Remote staff should "check-in" periodically with the appointed office-based staff member.

3.13) Manual Handling and Ergonomics

Where manual handling such as lifting heavy or awkward loads is necessary then the lift should be planned by an individual and made as straightforward as possible. In particular this may include team lifting to minimize strain on an individual or the use of mechanical devices such as a vehicle tail lift or ramp to assist.

Manual handling tasks are commonplace within BE so a general risk assessment is included here to minimise duplication.

What has the potential to cause harm (hazards)	Who is affected	Significant Risks	Initial risk			Record the preventive and protective measures to reduce risk sufficiently	Residual risk		
			S	P	R		S	P	R
Manual Handling and poor ergonomics	BE staff	Poor posture Lower back disorders Muscle strains and sprain, musculoskeletal injury	3	3	9	<ul style="list-style-type: none"> All staff to receive training in hazards related to poor lifting technique Mechanical aids shall be utilised where available Loads that are not light enough or are too awkward to be carried by one person shall be moved using team lifting Sufficient time shall be allocated to the task Additional care and attention shall be exercised if the ground surfaces are uneven or have different height gradients Correct PPE to be worn at all times which includes steel-toe safety footwear, hi-vis vests and hard hat as dictated by dynamic risk assessment and local management team 	3	1	3

3.14) Working at Height

In the first instance, work at height (WAH) is to be avoided where possible – WAH being where any person is likely to be injured as a result of a fall. It is recognized by BE that injuries caused by working at height are particularly prevalent within the entertainment industry and all such work should be regarded as having a high risk attached to it. When WAH cannot be avoided due to restricted access, time or financial pressures then suitable access equipment is to be made available and used in an appropriate and safe manner by competent people whilst following the principles of prevention. Reference should be made to HSE guidance INDG401 (<http://www.hse.gov.uk/pubns/indg401.pdf>)

Where WAH is to occur then both the area at height and the ground area surrounding should be considered prior to work taking place. A site-specific risk assessment should always be documented and, where equipment is to be flown from ground supported or available structures, an appropriate safe system of work should be documented outlining flown weights and method of erection/dismantling.

WAH tasks are commonplace within BE so key tasks are risk assessed here to minimise duplication.

What has the potential to cause harm (hazards)	Who is affected	Significant Risks	Initial risk			Record the preventive and protective measures to reduce risk sufficiently	Residual risk		
			S	P	R		S	P	R
Dropping of items when working at height	BE Staff Organisers Staff Contractors	Death Serious Injury Crushes	3	5	15H	NO UNAUTHORISED ACCESS at any times during rigging and de-rigging as established by show risk assessment. Ground area beneath rigging activities to be kept clear. Hard hats and high vis where appropriate. Only take required equipment to high working positions. Tools and equipment used at height should be tethered where possible	2	2	4
Ladders, stepladders and platforms	BE Staff Organisers Staff Contractors	Trips Falls Death Serious Injury Crushes	3	4	12H	Staff using ladders to be healthy and competent. Ladders should be fit for purpose and inspected regularly as required by PUWER 98 Place ladder front-on to the work and on stable ground. Never work sideways or over-reach.	2	2	4

						<p>Where necessary, ladders should be “footed” for stability and to aid awareness at ground level. The footer should be aware of their responsibilities and wear appropriate PPE.</p> <p>Don't put loose equipment where it could move or fall from height. Tools should be safely tethered.</p>			
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3.15) Forklift Truck Operation within Warehouse

A separate policy is available for operation of the warehouse forklift truck (FLT). Operation of the FLT is overseen by Joe Haycocks. Persons are not to be lifted with the FLT.

What has the potential to cause harm (hazards)	Who is affected	Significant Risks	Initial risk			Record the preventive and protective measures to reduce risk sufficiently	Residual risk		
			S	P	R		S	P	R
Inappropriate FLT operations	BE staff Contractors	Death Serious Injury Crushes	4	5	20H	<p>Forklift truck only to be operated by competent BE employees</p> <p>Access to warehouse environment is restricted to staff or supervised visitors</p>	4	1	4L
Pedestrian crush injury	BE staff Contractors Visitors	Death Serious Injury Crushes	4	5	20H	<p>FLT operations are to occur in safe area, verified by operator</p> <p>Where possible, operations scheduled for start or end of day</p> <p>Signage by warehouse entrance that FLT is operating</p>	4	1	4L

Operator crush injury	BE staff	Death Serious Injury	4	3	12H	FLT are fitted with overhead protection and operator seat belt No uneven surfaces in area of operation Items to be safely stowed prior to lifting operations FLT and racking not overloaded Passengers not allowed on FLT	4	1	4L
FLT / Workplace object impact / Structural Collapse	BE staff Contractors Visitors	Death Serious injury Crushes	4	3	12H	FLT operates in an area free of other vehicular traffic Workplace and structural features (eg. Racking) are identified and protected from impact	4	1	4L
Chemical / zxcacid burns	BE staff	Burns	3	3	9H	Dedicated FLT charging area Lift Truck battery maintenance carried out only by competent, authorised staff. Material Safety Data Sheets (MSDS) and COSHH assessments provided to staff responsible for battery maintenance. Suitable eye and hand PPE is also provided.	3	1	3L

3.16) Safety at Remote Locations

It is understood that workers of BE will regularly operate away from the main warehouse unit. Those working on site are to be adequately briefed regarding the nature and location of the work. Upon arrival on site a suitable induction will take place with the site supervisor outlining welfare facilities, specific hazards relating to the site and reporting procedures in case of incident.

3.17) Use of Theatrical Effects (eg. Smoke, Haze, Pyrotechnics)

Use of stage effects such as haze, smoke and pyrotechnics is to be subject to site-specific risk assessment. Staff using such items are to be competent in their use and any associated hazards.

3.18) Monitoring, Review and Reporting

Procedures for monitoring the application and validity of pre-planned safe systems of work will usually be through regular and random inspections of the work site. This will be undertaken by the site manager who may be assisted by clients, venue staff or H&S professionals. BE staff are expected to work respectfully with these figures to maintain a safe place of work at all times for all who may be present. In addition, all

personnel are expected to report any hazard that they may observe in the course of their duties. This is particularly important when considering the safety of venue staff and the public/guests within the live event environment. Where a hazard becomes apparent as a result of an accident or incident, this must be reported to line management as soon as possible once the area has been made safe.

3.19) Subcontractors

Subcontractors working for BE are required to conform to our minimum standards of safe operation in all areas. All subcontractors are required to hold up to date Public Liability insurance.

3.20) Infectious diseases such as Covid19

BE Audio that, as of mid-2021, management of Covid19 and other infectious diseases is complex due to vaccine deployment only being partially completed. We recognize that guests at our events may require different safety protocols to workers. We will continue to provide facilities for regular handwashing and sanitizing and encourage the use of face coverings in a crowded environment. It is better to minimize contact with others (through distancing, work cohorts, protective screens) than to rely on PPE and handwashing procedures. To accompany these work processes, BE will follow government guidance with regular lateral flow and PCR tests as appropriate and whilst supplied by the government to workers. Anyone who exhibits symptoms of Covid 19 (or indeed, other infectious diseases) should speak remotely to their line manager and will likely be unable to work for a period to protect the remaining workforce.

3.21) Asbestos

Within the live event environment asbestos is an uncommon hazard as project sites are generally suitable for access by the public. Where asbestos hazards are advised of by the site owner or discovered by a member of BE staff, work is to be suspended until senior management are notified and a suitable action put into place. This could include finding an alternative work area and gaining specialist advise.

3.22) Further Risks

Further risks which may need to be considered on an event by event basis within the general parameters of BE business may include:

- Scenic set and staging construction including temporary demountable structures
- Movement of vehicles through public spaces
- High sound pressure levels
- Working at night

All of the above could be high risk to BE staff or members of the public so should be carefully considered in each instance following the standard BE risk management processes.